

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:

18:md-2323-AB

**DECLARATION OF LEONARD A. DAVIS, ESQUIRE  
PURSUANT TO THIS COURT'S ORDER DATED MARCH 28, 2018**

LEONARD A. DAVIS declares the following, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief:

1. I am a partner of the law firm of Herman, Herman & Katz, LLC ("HHK"). Pursuant to this Court's Order dated March 28, 2018, I submit this declaration.
2. HHK has represented in the past, and currently represents, the following Plaintiffs in this litigation:

- A. Roosevelt Taylor and Claudia Hunt Taylor (“TAYLOR”);
- B. Brian P. Henesey and Caroline M. Henesey (“HENESEY”); and
- C. Fred Barnett, Andrew Glover, Jojuan Armour, Jamaica Rector and Kywin Supernaw (“BARNETT”).

3. Plaintiffs, TAYLOR, HENESEY and BARNETT, are members of the Settlement Subclass 1 certified by the Court. They have registered for Settlement benefits but have not applied for a Monetary Award, received a Monetary Award or been told they will receive a Monetary Award.

4. Plaintiffs, TAYLOR, HENESEY and BARNETT, have not entered agreements to assign their rights to Monetary award (“Assignments”).

5. HHK is not entitled to or obligated to pay forward any portion of any class members’ Monetary Award to a Third Party Litigation Funder as referenced by this Court’s March 28, 2018 Order.

6. HHK has not played any role in creating, promoting or facilitating Assignments or obligations as referenced above because none of HHK’s clients have received funding from a Third Party Litigation Funder.

7. No HHK attorney or attorney associated with HHK has a direct or indirect association with any Third Party Litigation Funder used by Settlement Class members.

8. HHK has no Assignments referenced above for Third Party Litigation Funders.

9. HHK does not have any documents to submit responsive to this Court's March 28, 2018 Order.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 4, 2018

/s/ Leonard A. Davis  
Leonard A. Davis, Esq.  
Herman, Herman & Katz, LLC  
820 O'Keefe Avenue  
New Orleans, LA 70113  
PH: (504) 581-4892  
Email: [ldavis@hhklawfirm.com](mailto:ldavis@hhklawfirm.com)